

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Victor Plastics, Inc.,

Debtor.

BKY No. 08-40171-DDO

Chapter 7

NOTICE OF HEARING AND APPLICATION
FOR INTERIM COMPENSATION BY
ATTORNEYS
FOR THE TRUSTEE

TO: The Debtor(s) and other entities specified in Local Rule 9013-3(a)(1).

1. Julia A. Christians, on behalf of Lapp, Libra, Thomson, Stoebner & Pusch, Chtd., attorneys for the Trustee of the above-captioned bankruptcy estate, moves the Court for the relief requested below and gives notice of hearing.

2. The Court will hold a hearing on this motion at 9:30 a.m. on December 9, 2009, in Courtroom 2B, 2nd Floor, 316 North Robert St., St. Paul, Minnesota 55101, or as soon thereafter as counsel may be heard.

3. Any entity opposing the motion under Local Rule 9013-2 is required to file and deliver a response, including a memorandum of facts and law and any opposing affidavit, not later than December 4, 2009, which is three days before the above date (excluding Saturdays, Sundays, and holidays, or file and serve a response by mail not later than November 30, 2009, which is seven days before the time set for the hearing (excluding Saturdays, Sundays, and holidays). **If no response is timely served and filed, the Court may grant the relief requested without a hearing.**

4. This Court has jurisdiction over this motion pursuant to 28 U.S.C. §157 and §1334, Bankruptcy Rule 5005 and Local Rule 1070-1. This proceeding is a core proceeding. The petition commencing this case as a Chapter 7 case was filed on March 16, 2009. The case is now pending in this Court.

5. This motion arises under 11 U.S.C. § 330 and § 331 and Bankruptcy Rule 2016 and Local Rule 2016-1. This motion is filed under Bankruptcy Rule 9014 and Local Rules 9013-1 et.seq. Applicant requests relief with respect to allowance of compensation for services rendered and reimbursement for expenses incurred. True and correct copies of all referenced exhibits are attached to the Motion as filed with the Court. A complete copy of this Motion and attached exhibits may be viewed at the Bankruptcy Court's web site at www.mnb.uscourts.gov.

6. Attached to this application as Exhibit "A" is a copy of the Application for Approval of Employment of Applicant dated September 5, 2008, and the Court Order approving the Trustee's employment of Julia A. Christians and Lapp, Libra, Thomson, Stoebner & Pusch, Chtd. (Applicant), as its attorneys pursuant to 11 U.S.C. §§ 327 and 328.

7. Applicant has not received a retainer.

8. Applicant has not made any previous applications for compensation or reimbursement of expenses.

9. ___ No plan has been confirmed.
 ___ A plan has been confirmed.
 XX Not Applicable.

10. As of the date of this Application, to the best of Applicant's belief, the following are the unpaid Chapter 7 administrative expenses that have been allowed in this case: none.

11. From September 5, 2008 through November 10, 2009, in the course of representation of the Trustee, Applicant has provided the following legal services:

(A) Represented the interests of the trustee in pursuing claims to recover alleged overpayments in bank fees and turnover of funds withheld by bank following unsuccessful recovery efforts of Debtor during Chapter 11 and written demands by the trustee including, written, telephonic and electronic communications with opposing counsel; investigation of status of accounts, agreements and transactions; review and comparison of bank's records and documentation produced; legal research; and, negotiations.

These efforts resulted in recovery for the estate in the amount of \$15,000.00.

In the course of representation of the trustee on the foregoing matters, Applicant, through members of her firm, has expended a total of 6.3 hours with a reasonable value of \$2,173.50. Said legal services performed are detailed and separated by task or proceeding on the computer printout daily time records of Applicant, attached hereto as Exhibit "B" and incorporated herein by reference.

(B) Represented the interests of the trustee in investigating and pursuing preferential transfer claims, including written, telephonic and electronic communications with transferees, opposing counsel, potential witnesses and the Court; review of financial records; drafting Complaints; investigating correct corporate names and agents for service; preparation of analyses of ordinary course of business and new value defenses, and review of opposing counsels' competing analyses; settlement negotiations; drafting, negotiating and revising settlement agreements; drafting, serving, filing and reviewing court orders; drafting and filing stipulations and proposed orders for extensions of time in adversaries; legal research; review of responsive pleadings; review of scheduling orders; drafting and serving interrogatories and document requests; negotiation of confidentiality agreements; analysis of financial disclosures produced in support of compromise offers; drafting, serving and filing stipulations and notices for dismissal and proposed orders for dismissal; review of discovery responses; negotiation of disputes over insufficient discovery responses; review of discovery served by defendants; drafting and serving responses to discovery; drafting, editing serving and filing motion, memorandum of law, affidavits and proposed finding of fact and conclusions of law for summary judgment; review response to summary judgment motion; prepare for and attend summary judgment hearing; and, analysis of issues of jury trial request in pending adversary.

These efforts resulted in recovery for the estate thus far, solely on matters in which Applicant was the only counsel representing the trustee, in the amount of \$128,382.00.

In the course of representation of the trustee on the foregoing matters, Applicant, through members of her firm, has expended a total of 149.2 hours with a reasonable value of \$42,013.00. Said legal services performed are detailed and separated by task or proceeding on the computer printout daily

time records of Applicant, attached hereto as Exhibit "C" and incorporated herein by reference.

(C) Represented the interests of the trustee in pursuing claims to recover alleged withheld escrows, letter of credit and overpayments by insurers of the debtor following written demands by the trustee including, written, telephonic and electronic communications with opposing counsel; investigation of accounting records and previous claims by the debtor; efforts to reconcile accountings; legal research; and, negotiations.

These efforts resulted in recovery for the estate in excess of \$113,800.00.

In the course of representation of the trustee on the foregoing matters, Applicant, through members of her firm, has expended a total of 11.8 hours with a reasonable value of \$4,184.00. Said legal services performed are detailed and separated by task or proceeding on the computer printout daily time records of Applicant, attached hereto as Exhibit "D" and incorporated herein by reference.

(D) Drafting, serving and filing this notice of hearing and interim fee application and preparing supporting exhibits, on which Applicant, through members of her firm, has expended a total of 6.6 hours with a reasonable value of \$2,343.00. Said legal services performed are detailed and separated by task or proceeding on the computer printout daily time records of Applicant, attached hereto as Exhibit "E" and incorporated herein by reference.

12. Time for the following persons is included in the application:

Julia A. Christians	Shareholder	(023)	\$345 per hour – 2008 \$355 per hour – 2009
Tyler D. Candee	Associate	(045)	\$195 per hour – 2009
Lori A. Frey	Paralegal	(210)	\$135 per hour – 2008 \$140 per hour – 2009
Debra L. Wegler	Paralegal	(046)	\$130 per hour – 2009

13. Set forth on attached Exhibit "E" is an itemization of all expenses incurred by Applicant, totaling \$512.50, as follows:

Adversary filing fee	\$250.00
Federal Express delivery fees	\$ 23.77
Westlaw computerized research	\$176.87
Document copying	\$ 6.00
Long distance telephone charges	\$.55
Postage	\$ 17.39
Parking for St. Paul court	\$ 24.50
Mileage	\$ 13.42

14. From September 5, 2008 through November 10, 2009, in the course of representation of the Trustee, Applicant, through members of her firm, has expended a grand total of 173.9 hours with a reasonable value of \$50,713.50, and has incurred expenses of \$512.50. Said legal services performed and expenses incurred are detailed and separated by task or proceeding on the computer printout daily time records of Lapp, Libra, Thomson, Stoebner & Pusch, Chartered, attached hereto as Exhibits "B through E" and incorporated herein by reference.

15. The amount set out herein is fair and reasonable for the services performed, is commensurate with fees charged in the community for similar services performed by persons of similar experience in this area and practice of law, and represents reasonable compensation of the actual, necessary services rendered by the Applicant, based on the time, the nature, the extent and the value of such services and the cost of comparable services other than a case under this Title. The expenses and disbursements detailed in Exhibit "E" are the actual and necessary expenses incurred by Applicant.

16. All services for which compensation is herein requested, and all costs and expenses incurred for which reimbursement is herein sought, were performed or expended for and on behalf of the Trustee and not on behalf of any other committee, creditor, or other person other than as set forth above.

17. Applicant has no agreement or understanding with any person for the sharing of compensation received or to be received for services rendered in connection with this proceeding.

18. A final report and account cannot be filed immediately for the reason that the estate needs to complete the following matters: multiple preference litigation matters, claims review and objections, and final tax return preparation. The foregoing matters could take approximately seven to nine months to complete.

19. There will be sufficient funds available for payment of Chapter 7 administrative expenses after deduction of amounts requested herein and, in the event insufficient funds exist to fully pay all similarly-situated administrative claims upon final distribution, Applicant agrees payments will need to be adjusted for pro-rata distribution.

WHEREFORE, Applicant moves the Court for an Order awarding to Applicant interim attorney's fees in the amount of \$50,713.50, and further awarding to Applicant reimbursement for expenses incurred in the amount of \$512.50 for a total of \$51,226.00; authorizing the Trustee to pay this sum from the funds on hand in the bankruptcy estate; and, such other relief as may be just and equitable.

LAPP, LIBRA, THOMSON, STOEGBNER
& PUSCH, CHARTERED

Dated: November 13, 2009

/e/ Julia A. Christians
Julia A. Christians (#157867)
One Financial Plaza, Suite 2500
120 South Sixth Street
Minneapolis, MN 55402
612/ 338-5815

Attorneys for the Trustee

VERIFICATION

I, Julia A. Christians, on behalf of Lapp, Libra, Thomson, Stoebner & Pusch, Chartered, the moving party named in the foregoing Notice of Hearing and Application, declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Executed on: November 13, 2009

Signed: /e/ Julia A. Christians
Julia A. Christians

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Victor Plastics Inc.,

BKY No. 08-40171-DDO

Debtor(s).

Chapter 7

APPLICATION FOR APPROVAL OF EMPLOYMENT OF ATTORNEY

1. Applicant is the trustee in this case.
2. Applicant believes that the employment of an attorney is necessary to represent or assist the trustee in carrying out the trustee's duties as follows: to investigate and pursue claims regarding an alleged overpayment of approximately \$15,000.00 in bank fees, issues of disputed reclamation claims, contested ownership rights in co-op patronage interests, claim objection motions, and such other matters as may be necessary to represent the interest of the trustee in the administration of this estate.
3. Julia A. Christians of Lapp, Libra, Thomson, Stoebner & Pusch, Chartered, 120 South Sixth Street, Suite 2500, Minneapolis, MN 55402, 612-338-5815, is qualified by reason of practice and experience to render such representation or assistance.
4. Proposed compensation and reimbursement of expenses is as follows: \$345.00 per hour for Julia A. Christians, \$135.00 per hour for paralegal services, and the normal hourly rate for other attorneys in the firm. In addition, said compensation rates are subject to periodic adjustments.
5. Said professional has disclosed to the undersigned that she has the following connections with the debtor(s), creditors, any other party-in-interest, their respective attorneys and accountants, the United States Trustee or any person employed in the Office of the United States Trustee: She is the Chapter 7 Trustee for the above-referenced bankruptcy estate.
6. The trustee has made the following efforts to recover the asset prior to submitting this Application: questioned debtor's representative regarding the disputed issues, reviewed documentation, corresponded with claimants and made written demand upon bank counsel.

WHEREFORE, applicant prays that the Court approve such employment by the trustee.

Dated: September 5, 2008

/e/ Julia A. Christians
Julia A. Christians, Trustee
One Financial Plaza, Suite 2500
120 South Sixth Street
Minneapolis, MN 55402
(612) 338-5815

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Victor Plastics Inc.,

BKY Case No. 08-40171-DDO

Debtor(s).

Chapter 7

VERIFIED STATEMENT PURSUANT TO FEDERAL RULE 2014(a)

I, Julia A. Christians of Lapp, Libra, Thomson, Stoebner & Pusch, Chartered, the professional named in the application for employment on behalf of the above named bankruptcy estate, declare under penalty of perjury the following:

1. I do not hold or represent any interest adverse to the estate and am disinterested as required by 11 U.S.C. § 327.
2. I do not have any connections to the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the offices of the United States Trustee, except for the following: I am the Chapter 7 Trustee for the above-referenced bankruptcy estate.

Dated: September 5, 2008

By: /e/ Julia A. Christians
Julia A. Christians
Lapp, Libra, Thomson, Stoebner & Pusch, Chartered
120 South Sixth Street, Suite 2500
Minneapolis, MN 55402
612-338-5815

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Victor Plastics Inc.,

BKY Case No. 08-40171-DDO

Debtor(s).

Chapter 7

ORDER

The application to employ Lapp, Libra, Thomson, Stoebner & Pusch, Chartered, as attorneys for the trustee came before the court. Based on the application, the recommendation of the United States Trustee, and pursuant to the provisions of Title 11, United States Code, § 327,

IT IS ORDERED: The professional employment applied for is approved subject to the limitations on compensation provided by Title 11, United States Code, § 328.

Dated: September 8, 2008

/e/ Dennis D. O'Brien
United States Bankruptcy Judge

NOTICE OF ELECTRONIC ENTRY AND FILING ORDER OR JUDGMENT Filed and Docket Entry made on 09/08/2008 Lori Vosejpka, Clerk, by SKM
--

EXHIBIT B

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 1

Client-Matter	Client Reporting Name	Matter Reporting Name	Billing Timekeeper	
---------------	-----------------------	-----------------------	--------------------	--

0004888-08204A	DOE ESTATE, JANE	VICTOR PLASTICS, INC.	023	CHRISTIANS, JULIA A.
----------------	------------------	-----------------------	-----	----------------------

Originating Timekeeper

023 CHRISTIANS, JULIA A.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours Worked</u>	<u>Hours To Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Narrative</u>	<u>Task Code</u>	<u>Activity Code</u>	<u>Budget Phase</u>	<u>Code 1</u>	<u>Code 2</u>	<u>Code 3</u>
09/05/2008	023	4.50	4.50	345.00	1,552.50	TELEPHONE CONFERENCES WITH ATTORNEY LIPKE FOR PNC BANK REGARDING TRUSTEE'S DEMAND FOR PAYMENT ON ALLEGED OVERCHARGES; REVIEW INCOMING CORRESPONDENCE FROM LIPKE; REVIEW AND COMPARE BANK RECORDS TO DEBTOR'S RECORDS REGARDING DISPUTED CLAIMS; LEGAL RESEARCH.						
09/08/2008	023	1.80	1.80	345.00	621.00	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY LIPKE FOR PNC BANK; REVIEW DOCUMENTATION FROM BANK IN RESPONSE TO CLAIMS AND DEMANDS; REPLY.						

<u>Timekeepers</u>	<u>Hours Worked</u>	<u>Hours To Bill</u>	<u>Rate</u>	<u>Amount</u>
023	6.30	6.30	345.00	2,173.50
Timekeeper Totals	6.30	6.30		\$2,173.50

Bill Total \$2,173.50
Last Active 11/9/2009

Last Payment

EXHIBIT C

LAPP LIBRA THOMSON STOEbNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 2

Client-Matter	Client Reporting Name	Matter Reporting Name	Billing Timekeeper	
---------------	-----------------------	-----------------------	--------------------	--

0004888-08204B	DOE ESTATE, JANE	VICTOR PLASTICS, INC.	023	CHRISTIANS, JULIA A.
----------------	------------------	-----------------------	-----	----------------------

Originating Timekeeper

023 CHRISTIANS, JULIA A.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours Worked</u>	<u>Hours To Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Narrative</u>	<u>Task Code</u>	<u>Activity Code</u>	<u>Budget Phase</u>	<u>Code 1</u>	<u>Code 2</u>	<u>Code 3</u>
09/09/2008	023	1.70	1.70	345.00	586.50	DRAFT CORRESPONDENCE TO M. HOLLAND COMPANY REGARDING RECLAMATION DISPUTE AND PREFERENCE CLAIM ISSUES; TELEPHONE CONFERENCE WITH ATTORNEY HUGHES REGARDING PREFERENCE RESPONSE ISSUES; DRAFT CORRESPONDENCE TO V. VENABLE REGARDING PREFERENCE AMOUNT DISPUTE; DRAFT CORRESPONDENCE TO ATTORNEY NATHAN REGARDING DOCUMENT REQUEST ON PREFERENCE CLAIM; TELEPHONE CONFERENCE WITH ATTORNEY BANKER DISPUTING PREFERENCE DEMAND.						
09/10/2008	023	.50	.50	345.00	172.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY APPLEBAUM DISPUTING PREFERENCE CLAIM AMOUNTS; DRAFT CORRESPONDENCE TO APPLEBAUM.						
09/11/2008	023	.30	.30	345.00	103.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY SCHLENKER REGARDING ORDINARY COURSE DEFENSE AND POTENTIAL SETTLEMENT.						
09/12/2008	023	.30	.30	345.00	103.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY SAINÉ FOR ELECTROLUX REGARDING PREFERENCE AND DEFENSE ASSIGNMENT ISSUES.						
09/15/2008	023	.80	.80	345.00	276.00	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY BANKER; REVIEW ANALYSIS AND SPREADSHEETS IN SUPPORT OF NEW VALUE AND ORDINARY COURSE PREFERENCE DEFENSES.						
09/19/2008	023	.50	.50	345.00	172.50	TELEPHONE CONFERENCE WITH ATTORNEY HUGHES FOR TRANSFEREE PACKAGING DISTRIBUTION; DRAFT CORRESPONDENCE TO HUGHES.						
09/22/2008	023	.60	.60	345.00	207.00	REVIEW INCOMING CORRESPONDENCE FROM TRANSFEREE M. HOLLAND REGARDING ORDINARY COURSE AND NEW VALUE DEFENSE ISSUES; REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY RENDA REGARDING ASSERTED DEFENSES BY TRANSFEREE.						

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 3

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
09/26/2008	023	1.10	1.10	345.00	379.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY KYDALA REGARDING PRECISION FASTENERS PREFERENCE; ANALYZE DOCUMENTS IN SUPPORT OF PARTIAL DEFENSES AND OFFER OF SETTLEMENT.	
09/29/2008	023	1.80	1.80	345.00	621.00	COMPARE TRANSFEREE PRECISION FASTENER'S NEW VALUE RECORDS TO DEBTOR'S; DRAFT CORRESPONDENCE TO ATTORNEY KYDALA REGARDING COUNTER-OFFER OF SETTLEMENT; DRAFT CORRESPONDENCE TO ATTORNEY APPLEBAUM WITH REQUESTED SUPPORTING INFORMATION ON PREFERENCE CLAIM V. ENTEC; DRAFT CORRESPONDENCE TO ATTORNEY BANKER WITH REQUESTED SUPPORTING INFORMATION ON PREFERENCE CLAIM V. CLARIANT; DRAFT CORRESPONDENCE TO ATTORNEY HANLEY WITH REQUESTED SUPPORTING INFORMATION ON PREFERENCE CLAIM V. M. HOLLAND.	
09/29/2008	210	.20	.20	135.00	27.00	REVIEW CLAIMS REGISTER FOR CLAIM FILED PRECISION FASTENERS.	
09/30/2008	023	.30	.30	345.00	103.50	TELEPHONE CONFERENCE WITH ATTORNEY SCHLINKER REGARDING DEFENSES AND NEGOTIATIONS ON JERICO PREFERENCE.	
10/01/2008	023	.30	.30	345.00	103.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY JAMES REGARDING CONTEMPORANEOUS EXCHANGE AND ORDINARY COURSE DEFENSE ARGUMENTS ON FIRST CHOICE PREFERENCE.	
10/02/2008	023	2.40	2.40	345.00	828.00	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY SCHLENKER REGARDING TRANSFEREE JERICO'S DEFENSES TO PREFERENCE CLAIM AND SETTLEMENT OFFER; ANALYZE JERICO NEW VALUE AND ORDINARY COURSE ANALYSIS AND COMPARE TO DEBTOR'S RECORDS; DRAFT CORRESPONDENCE TO COUNSEL WITH COUNTER-OFFER; ANALYZE TIMING OF TRANSFERS TO SABIC AND ITS RELATED ENTITY; DRAFT CORRESPONDENCE TO ATTORNEY VENABLE.	
10/02/2008	210	.20	.20	135.00	27.00	REVIEW CLAIMS REGISTER FOR CLAIM FILED BY JERICO SERVICES.	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 4

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
10/08/2008	023	1.30	1.30	345.00	448.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY WARD REGARDING ERRORS IN HIS CLIENT'S ANALYSIS ON MARSHALLTOWN PREFERENCE; TELEPHONE CONFERENCE WITH ATTORNEY SCHLENKER REGARDING DISPUTE ON ORDINARY COURSE ANALYSIS AND CONTINUING NEGOTIATIONS ON JERICO CLAIM; REVIEW INCOMING CORRESPONDENCE FROM AND TELEPHONE CONFERENCE WITH ATTORNEY DAUFELDT ON MCINNIS PREFERENCE.	
10/10/2008	023	1.40	1.40	345.00	483.00	REVIEW INCOMING CORRESPONDENCE FROM TRANSFEREE SABIC REGARDING DISPUTE OVER PAYMENTS; DRAFT REPLY CORRESPONDENCE TO SABIC; PREPARE RESPONSE TO INQUIRIES OF ATTORNEY HUGHES ON BEHALF OF TRANSFEREE PDS; E-MAIL CORRESPONDENCE WITH HUGHES.	
10/13/2008	023	1.50	1.50	345.00	517.50	DRAFT PROPOSED SETTLEMENT AGREEMENT ON JERICO PREFERENCE CLAIM; DRAFT CORRESPONDENCE TO ATTORNEY SCHLENKER; DRAFT CORRESPONDENCE TO ATTORNEY DAUFELDT REGARDING TIMING ISSUES ON MCINNIS PREFERENCE.	
10/17/2008	023	.30	.30	345.00	103.50	TELEPHONE CONFERENCE WITH ATTORNEY SCHLENKER REGARDING REQUESTED AMENDMENT TO JERICO SETTLEMENT AGREEMENT.	
10/21/2008	023	.50	.50	345.00	172.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY SCHLENKER WITH HAND-WRITTEN CHANGES TO JERICO SETTLEMENT AGREEMENT; DRAFT CORRESPONDENCE TO SCHLENKER.	
10/22/2008	023	.60	.60	345.00	207.00	DRAFT CORRESPONDENCE TO ATTORNEY BANKER REGARDING ORDINARY COURSE ANALYSIS OFFERED; DRAFT CORRESPONDENCE TO ATTORNEY JAMES REGARDING ADDITIONAL DOCUMENTATION IN SUPPORT OF CONTEMPORANEOUS EXCHANGE DEFENSE OF FCD.	
10/29/2008	023	.30	.30	345.00	103.50	TELEPHONE CONFERENCE WITH TRANSFEREE INVENSYS IN-HOUSE COUNSEL REGARDING IMPLICATIONS OF INDEMNITY AGREEMENT IN PREFERENCE MATTER.	
10/31/2008	023	.80	.80	345.00	276.00	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY MEYER REGARDING TENDER OF DEFENSE OF INVENSYS PREFERENCE TO ELECTROLUX; DRAFT CORRESPONDENCE TO MEYER WITH SUBSTANTIATION.	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 5

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
11/03/2008	023	.20	.20	345.00	69.00	TELEPHONE CONFERENCE WITH ATTORNEY DAUFELDT REGARDING RESPONSE OF TRANSFEREE MCINNIS.	
11/05/2008	023	.70	.70	345.00	241.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY APPLEBAUM REGARDING DISPUTE ON ENTEC PREFERENCE; REVIEW PAYMENT RECORDS FOR SUBSTANTIATION; DRAFT CORRESPONDENCE TO APPLEBAUM.	
11/17/2008	023	.30	.30	345.00	103.50	DRAFT CORRESPONDENCE WITH DOCUMENTATION TO ATTORNEY APPLEBAUM IN NEGOTIATIONS ON ENTEC PREFERENCE.	
11/18/2008	210	.30	.30	135.00	40.50	DRAFT ORDER APPROVING JERICO SETTLEMENT. EMAIL SAME TO JUDGE FOR SIGNATURE.	
11/19/2008	023	.30	.30	345.00	103.50	REVIEW COURT ORDER ON JERICO PREFERENCE; DRAFT CORRESPONDENCE TO OPPOSING COUNSEL REGARDING NEED TO COMPLETE SETTLEMENT.	
11/20/2008	023	3.60	3.60	345.00	1,242.00	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY JAMES AND INVOICES AND PAYMENT HISTORY DOCUMENTS IN SUPPORT OF CONTEMPORANEOUS EXCHANGE AND ORDINARY COURSE DEFENSES OF TRANSFEREE FIRST CHOICE PAPER; COMPARE NEW VALUE ANALYSES; REVIEW INCOMING CORRESPONDENCE AND DOCUMENTS IN SUPPORT OF ASSERTED SUBSEQUENT NEW VALUE DEFENSE OF TRANSFEREE M HOLLAND; REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY GOETZ AND SPREADSHEET OF PAYMENT HISTORY IN SUPPORT OF ORDINARY COURSE DEFENSE OF TRANSFEREE AGRI INDUSTRIAL; ANALYZE SETTLEMENT OFFER OF AGRI; DRAFT PROPOSED SETTLEMENT AGREEMENT AND MUTUAL RELEASES ON AGRI CLAIM; DRAFT CORRESPONDENCE TO ATTORNEY GOETZ.	
11/21/2008	023	.50	.50	345.00	172.50	PREPARE SETTLEMENT PROPOSAL ON FIRST CHOICE PREFERENCE MATTER; DRAFT CORRESPONDENCE TO ATTORNEY JAMES.	
11/26/2008	023	.50	.50	345.00	172.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY GOETZ WITH AGRI INDUSTRIES EXECUTED SETTLEMENT AGREEMENT; DRAFT CORRESPONDENCE TO GOETZ.	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 6

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
12/01/2008	023	.80	.80	345.00	276.00	REVIEW INCOMING CORRESPONDENCE AND DOCUMENTS FROM TRANSFEREE AGRI-INDUSTRIAL REGARDING FINALIZING SETTLEMENT; REVIEW INCOMING CORRESPONDENCE AND DOCUMENTS FROM ATTORNEY SCHLENKER FOR TRANSFEREE JERICO REGARDING FINALIZING SETTLEMENT.	
12/08/2008	023	.60	.60	345.00	207.00	TELEPHONE CONFERENCE WITH ATTORNEY KYDALA REGARDING NEGOTIATIONS ON PRECISION PREFERENCE; DRAFT CORRESPONDENCE TO KYDALA.	
12/22/2008	210	.20	.20	135.00	27.00	DRAFT ORDER APPROVING AGRI SETTLEMENT.	
12/23/2008	023	.10	.10	345.00	34.50	REVIEW COURT ORDER REGARDING AGRI PREFERENCE SETTLEMENT.	
01/02/2009	023	.30	.30	355.00	106.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY WARD REGARDING ORDINARY COURSE ANALYSIS ON MARSHALLTOWN PREFERENCE.	
01/07/2009	023	.30	.30	355.00	106.50	DRAFT CORRESPONDENCE TO ATTORNEY KYDALA REGARDING CONDITIONAL ACCEPTANCE OF SETTLEMENT COUNTER-OFFER ON PRECISON FASTENERS PREFERENCE.	
01/13/2009	023	1.10	1.10	355.00	390.50	DRAFT PROPOSED SETTLEMENT AGREEMENT AND MUTUAL RELEASE ON PRECISION FASTENERS PREFERENCE; DRAFT CORRESPONDENCE TO OPPOSING COUNSEL KYDALA.	
01/14/2009	023	1.20	1.20	355.00	426.00	REVIEW LETTER BRIEF FROM ATTORNEY WARD AND ANALYZE CITED DOCUMENTS IN SUPPORT OF ORDINARY COURSE DEFENSE TO PREFERENCE CLAIMS; REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY JAMES WITH COUNTER-OFFER OF SETTLEMENT ON FIRST CHOICE PREFERENCE.	
01/15/2009	023	1.30	1.30	355.00	461.50	REVIEW COUNTER-OFFER OF SETTLEMENT BY ATTORNEY JAMES ON BEHALF OF PREFERENCE TRANSFEREE FIRST CHOICE DISTRIBUTION; DRAFT PROPOSED SETTLEMENT AGREEMENT; DRAFT CORRESPONDENCE TO JAMES WITH COUNTER-PROPOSAL.	
01/16/2009	023	.90	.90	355.00	319.50	TELEPHONE CONFERENCES WITH ATTORNEY MEYERS REGARDING MULTIPLE ASSERTED DEFENSES OF PREFERENCE TRANSFEREE ELECTROLUX/INVENSYS; SETTLEMENT NEGOTIATIONS.	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 7

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
02/04/2009	023	.70	.70	355.00	248.50	TELEPHONE CONFERENCE WITH AND DRAFT CORRESPONDENCE TO ATTORNEY JAMES REGARDING NEGOTIATING AMENDMENTS TO PROPOSED SETTLEMENT AGREEMENT ON FIRST CHOICE PREFERENCE MATTER.	
02/24/2009	023	.40	.40	355.00	142.00	E-MAIL CORRESPONDENCE FROM AND TO ATTORNEY JAMES REGARDING NEGOTIATIONS ON SETTLEMENT TERMS IN FIRST CHOICE PREFERENCE.	
03/02/2009	023	.50	.50	355.00	177.50	REVIEW INCOMING CORRESPONDENCE FROM OPPOSING COUNSEL ON FIRST CHOICE PREFERENCE WITH SETTLEMENT FUNDS AND AGREEMENT; DRAFT CORRESPONDENCE TO COUNSEL WITH EXECUTED SETTLEMENT AGREEMENT.	
03/06/2009	023	.30	.30	355.00	106.50	TELEPHONE CONFERENCE WITH OPPOSING COUNSEL REGARDING CURE OF DEFAULT ON COMMENCEMENT OF SETTLEMENT PAYMENT INSTALMENTS IN PRECISION FASTENERS PREFERENCE.	
03/09/2009	023	.30	.30	355.00	106.50	REVIEW INCOMING CORRESPONDENCE FROM TRANSFEREE PRECISION REGARDING PREFERENCE SETTLEMENT.	
03/25/2009	023	1.00	1.00	355.00	355.00	ORGANIZE PREFERENCE FILES; NOTES REGARDING ACTION TO BE TAKEN.	
04/08/2009	023	2.20	2.20	355.00	781.00	DRAFT PREFERENCE COMPLAINT V. TRANSFEREE PACKAGING DISTRIBUTION; RESEARCH LEGAL I.D.'S AND AGENTS FOR SERVICE WITH IOWA SECRETARY OF STATE ON MULTIPLE DEFENDANTS.	
04/09/2009	023	.10	.10	355.00	35.50	REVIEW COURT ORDER RE PRECISION FASTENERS SETTLEMENT.	
04/09/2009	023	2.30	2.30	355.00	816.50	WORK ON ORDINARY COURSE DEFENSE ANALYSES ON DISPUTED PREFERENCES; DRAFT CORRESPONDENCE TO ATTORNEY DICASTRI REFUTING ORDINARY COURSE ANALYSIS ON TOOLING TECHNOLOGIES.	
04/14/2009	023	2.50	2.50	355.00	887.50	DRAFT COMPLAINTS AGAINST PREFERENCE TRANSFEREES IOWA MOLD & ENGINEERING AND MSI MOLD; ATTENTION TO FILING AND SERVICE INSTRUCTIONS.	
04/22/2009	023	.30	.30	355.00	106.50	REVIEW PLEADINGS AND ORDER RE PRO HAC VICE ADMISSION.	
04/23/2009	023	1.10	1.10	355.00	390.50	ATTENTION TO FILING AND SERVICE OF MSI PREFERENCE COMPLAINT; WORK ON TOOLING TECH. ORDINARY COURSE DEFENSE ANALYSIS; REVIEW AND REVISE SETTLEMENT NEGOTIATION CORRESPONDENCE TO OPPOSING COUNSEL.	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 8

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
04/28/2009	023	.80	.80	355.00	284.00	REVIEW NEW VALUE AND ORDINARY COURSE ANALYSES ON PREFERENCE SUIT WITH DEFENDANT IOWA MOLD.	
04/28/2009	210	.50	.50	140.00	70.00	REVIEW ATTACHMENTS TO TOOLING TECHNOLOGIES PROOF OF CLAIM TO DETERMINE NEW VALUE DEFENSE ACCURACY.	
04/29/2009	023	.50	.50	355.00	177.50	TELEPHONE CONFERENCE WITH ATTORNEY MARTIN REGARDING ALLEGED DEFENSES OF DEFENDANT IOWA MOLD, POTENTIAL FOR SETTLEMENT AND EXTENSION OF RESPONSE TIME; NOTES TO FILE.	
04/30/2009	023	.50	.50	355.00	177.50	REVIEW INFORMATION REGARDING POST-PETITION TRANSFER TO PREFERENCE DEFENDANT IOWA MOLD AND POTENTIAL FOR NEED TO AMEND COMPLAINT.	
05/01/2009	023	.30	.30	355.00	106.50	TELEPHONE CONFERENCES WITH ATTORNEY HUGHES ON PACKAGING DISTRIBUTION ADVERSARY.	
05/04/2009	023	1.90	1.90	355.00	674.50	TELEPHONE CONFERENCE WITH ATTORNEY HUGHES FOR DEFENDANT PDS; DISCUSS ALLEGED NEW VALUE, CONTEMPORANEOUS EXCHANGE AND ORDINARY COURSE DEFENSES; SETTLEMENT DISCUSSIONS; DRAFT PROPOSED STIPULATION TO EXTEND TIME TO ANSWER AND PROPOSED ORDER; DRAFT CORRESPONDENCE TO HUGHES; MEMO TO PARALEGAL REGARDING RESEARCH.	
05/04/2009	046	.20	.20	130.00	26.00	CONFERENCE WITH J. CHRISTIANS CONCERNING PREFERENCE ANALYSIS FOR PACKAGING DISTRIBUTION SERVICES.	
05/05/2009	046	2.20	2.20	130.00	286.00	REVIEW AND ANALYZE FILE CONCERNING PREFERENCE PAYMENTS TO PACKAGING DISTRIBUTION SERVICE; CALCULATE AMOUNTS TRANSFERRED TO PACKAGING DISTRIBUTION SERVICE	
05/06/2009	046	1.60	1.60	130.00	208.00	REVIEW AND ANALYZE PAYMENTS TO PACKAGING DISTRIBUTION SERVICE; DRAFT MEMORANDUM CONCERNING SAME; CONFERENCE WITH J. CHRISTANS REGARDING FINDINGS	
05/08/2009	023	.90	.90	355.00	319.50	REVIEW INCOMING CORRESPONDENCE FROM OPPOSING COUNSEL ON PDS ADVERSARY; FILE AND SERVE STIPULATION TO EXTEND TIME AND PROPOSED ORDER; CONFERENCE WITH PARALEGAL REGARDING ORDINARY COURSE DEFENSE ANALYSIS.	
05/08/2009	046	.90	.90	130.00	117.00	CONFERENCE WITH J. CHRISTIANS CONCERNING NEW VALUE ANALYSIS; DRAFT CHART CONCERNING SAME	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 9

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
05/11/2009	046	1.80	1.80	130.00	234.00	OBTAIN PROOF OF CLAIM FOR TOOLING TECHNOLOGIES AND REVIEW; REVIEW AND ANALYZE PREFERENCE PAYMENTS	
05/11/2009	210	.20	.20	140.00	28.00	EMAIL ORDER TO JUDGE FOR SIGNATURE.	
05/11/2009	023	.90	.90	355.00	319.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY HUGHES ON PDS ADVERSARY; DRAFT E-MAIL CORRESPONDENCE IN REPLY; REVIEW REVISED NEW VALUE ANALYSIS.	
05/12/2009	023	1.80	1.80	355.00	639.00	LEGAL RESEARCH; PREPARE AND GATHER SUPPORTING RECORDS FOR COUNTER OFFER OF SETTLEMENT ON PDS PREFERENCE ADVERSARY; DRAFT CORRESPONDENCE TO PDS ATTORNEY.	
05/12/2009	046	.80	.80	130.00	104.00	ANALYZE PROOF OF CLAIM FILING OF TOOLING TECHNOLOGIES AND RECONCILE TO CLAIM AMOUNT	
05/18/2009	023	.90	.90	355.00	319.50	REVIEW COURT ORDER EXTENDING TIME IN PDS ADVERSARY; DRAFT CORRESPONDENCE TO ATTORNEY HUGHES; REVIEW INCOMING CORRESPONDENCE AND ANSWER FILED BY DEFENDANT IOWA MOLD.	
05/19/2009	023	.50	.50	355.00	177.50	E-MAIL CORRESPONDENCE TO AND FROM ATTORNEY FISCHER REGARDING INTERPOSING ANOTHER ANSWER IN IOWA MOLD ADVERSARY.	
05/20/2009	023	.60	.60	355.00	213.00	TELEPHONE CALLS WITH ATTORNEY IANNAONE ON MSI MOLD ADVERSARY.	
05/22/2009	023	.90	.90	355.00	319.50	REVIEW ANSWER FILED BY ATTORNEY FISHER ON IOWA MOLD ADVERSARY; REVIEW COURT SCHEDULING ORDER; CONFERENCE WITH ATTORNEY CANDEE REGARDING DISCOVERY.	
05/27/2009	023	.40	.40	355.00	142.00	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY IANNAONE; REVIEW ANSWER TO COMPLAINT SERVED BY DEFENDANT MSI MOLD.	
05/28/2009	023	.80	.80	355.00	284.00	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY HUGHES REGARDING DISPUTED DEFENSES; ANALYZE COUNTER OFFER OF SETTLEMENT; DRAFT CORRESPONDENCE TO HUGHES.	
05/28/2009	045	1.00	1.00	195.00	195.00	REVIEW COMPLAINT AND ANSWER IN IOWA MOLD ADVERSARY; DRAFT INTERROGATORIES	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 10

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
05/29/2009	023	2.60	2.60	355.00	923.00	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY HUGHES REGARDING REQUEST FOR ADDITIONAL EXTENSION ON PDS ADVERSARY; DRAFT E-MAIL CORRESPONDENCE TO HUGHES; CONFERENCE WITH ATTORNEY CANDEE REGARDING DISCOVERY WORK ON MSI MOLD AND IOWA MOLD ADVERSARIES; REVIEW NUMEROUS E-MAILS FROM ATTORNEY HUGHES REGARDING SETTLEMENT NEGOTIATIONS ON PDS; DRAFT STIPULATION FOR FURTHER EXTENSION IN PDS CASE; DRAFT CORRESPONDENCE TO HUGHES.	
06/01/2009	023	.90	.90	355.00	319.50	REVIEW INCOMING CORRESPONDENCE AND EXECUTED STIPULATION FROM ATTORNEY HUGHES ON PDS ADVERSARY; DRAFT PROPOSED ORDER; ATTENTION TO FILING AND SERVICE OF STIPULATION AND ORDER IN PDS.	
06/02/2009	023	.20	.20	355.00	71.00	REVIEW COURT ORDER IN PDS ADVERSARY RE FURTHER EXTENSION OF TIME TO ANSWER.	
06/03/2009	023	.30	.30	355.00	106.50	REVIEW COURT ORDER WITH SCHEDULING DEADLINES IN MSI MOLD ADVERSARY.	
06/04/2009	023	.30	.30	355.00	106.50	TELEPHONE CONFERENCE WITH ATTORNEY HUGHES REGARDING NEGOTIATIONS ON PDS ADVERSARY.	
06/06/2009	045	2.10	2.10	195.00	409.50	REVIEW DOCUMENTS RELATED TO KAWASAKI SETTLEMENT DURING CHAPTER 11; DRAFT INTERROGATORIES AND DOCUMENT REQUESTS TO IOWA MOLD; REVIEW MSI ANSWER; E-MAIL TO J. CHRISTIANS	
06/09/2009	023	.80	.80	355.00	284.00	TELEPHONE CONFERENCES WITH ATTORNEY HUGHES ON PDS ADVERSARY REGARDING NEGOTIATION OF CONFIDENTIALITY OF FINANCIAL DISCLOSURES; DRAFT CORRESPONDENCE TO HUGHES.	
06/09/2009	023	.80	.80	355.00	284.00	REVIEW AND REVISE INTERROGATORIES AND REQUESTS FOR DOCUMENT PRODUCTION IN IOWA MOLD ADVERSARY; STRATEGY CONFERENCE WITH ATTORNEY CANDEE REGARDING ADDITIONAL CLAIMS RELATED TO KAWASAKI SETTLEMENT.	
06/09/2009	045	.50	.50	195.00	97.50	REVISE INTERROGATORIES AND DOCUMENT REQUESTS TO IOWA MOLD; ATTENTION TO SERVICE OF SAME; DRAFT INTERROGATORIES AND DOCUMENT REQUESTS TO MSI; ATTENTION TO SERVICE OF SAME	
06/09/2009	210	.20	.20	140.00	28.00	EMAIL ORDER TO JUDGE FOR SIGNATURE.	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 11

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
06/11/2009	023	2.70	2.70	355.00	958.50	REVIEW FINANCIAL DISCLOSURES FROM DEFENDANT PDS IN SUPPORT OF SETTLEMENT OFFER; REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY HUGHES; PREPARE COUNTER-OFFERS OF SETTLEMENT ON ALTERNATIVE TERMS; DRAFT CORRESPONDENCE TO HUGHES; CONTINUING SETTLEMENT NEGOTIATIONS; E-MAIL NOTICE TO JUDGE'S CLERK; E-MAIL INQUIRES AND RESPONSES TO COURT AND OPPOSING PARTY.	
06/12/2009	023	1.80	1.80	355.00	639.00	DRAFT PROPOSED SETTLEMENT AGREEMENT ON PDS PREFERENCE ADVERSARY; DRAFT E-MAIL CORRESPONDENCE TO ATTORNEY HUGHES; REVIEW INCOMING CORRESPONDENCE FROM OPPOSING COUNSEL WITH REQUEST FOR REVISIONS TO AGREEMENT; DRAFT REVISED AGREEMENT; CORRESPONDENCE TO COUNSEL.	
06/15/2009	023	.50	.50	355.00	177.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY HUGHES REGARDING ADDITIONAL DEMAND FOR CHANGE IN SETTLEMENT AGREEMENT TERMS; DRAFT CORRESPONDENCE TO HUGHES.	
06/16/2009	023	.80	.80	355.00	284.00	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY MARTIN ON IOWA MOLD ADVERSARY; REVIEW SETTLEMENT PROPOSAL AND SUPPORTING ANALYSIS AND DOCUMENTATION.	
06/16/2009	045	.80	.80	195.00	156.00	REVIEW AND RESPOND TO SETTLEMENT CORRESPONDENCE IN IOWA MOLD ADVERSARY; RESEARCH JURISDICTIONAL QUESTIONS OF NOVA SUIT	
06/17/2009	023	1.70	1.70	355.00	603.50	REVIEW MEMO FROM ATTORNEY CANDEE; REVIEW RESPONSE TO IOWA MOLD SETTLEMENT OFFER; REVIEW INFORMATION REGARDING JURISDICTION ISSUES ON NOVA PREFERENCE; MEMO TO CANDEE; REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY SACKETT ON PDS ADVERSARY; FILE EXECUTED SETTLEMENT AGREEMENT WITH COURT AND SERVE ON COUNSEL.	
06/17/2009	045	.30	.30	195.00	58.50	E-MAILS REGARDING IOWA MOLD ADVERSARY; E-MAILS REGARDING NOVA ADVERSARY	
06/18/2009	023	.60	.60	355.00	213.00	CONFERENCE WITH ATTORNEY CANDEE REGARDING STRATEGY ON NOVA SUIT; REVIEW COURT ORDER APPROVING MULTIPLE PREFERENCE SETTLEMENTS.	
06/26/2009	045	.10	.10	195.00	19.50	E-MAILS REGARDING DISCOVERY IN IOWA MOLD ADVERSARY	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 12

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
07/06/2009	023	.40	.40	355.00	142.00	CORRESPONDENCE WITH IOWA MOLD COUNSEL REGARDING DISCOVERY AND EXTENSION REQUESTS.	
07/06/2009	045	.10	.10	195.00	19.50	E-MAILS REGARDING IOWA MOLD DISCOVERY	
07/10/2009	023	1.00	1.00	355.00	355.00	REVIEW NEW VALUE ANALYSIS ON TOOLING TECHNOLOGIES PREFERENCE CLAIM; COMPARE TO ANALYSIS OF OPPOSING COUNSEL; DRAFT CORRESPONDENCE TO OPPOSING COUNSEL REGARDING ISSUES AND SETTLEMENT OFFER.	
07/13/2009	023	.80	.80	355.00	284.00	REVIEW AND REVISE PROPOSED ORDER ON PDS PREFERENCE SETTLEMENT; REVIEW COURT ORDER ISSUED; DRAFT CORRESPONDENCE TO OPPOSING COUNSEL.	
07/13/2009	045	1.10	1.10	195.00	214.50	E-MAILS WITH J. CHRISTIANS REGARDING DISCOVERY IN IOWA MOLD MATTER; DRAFT STIPULATION TO AMEND SCHEDULING ORDER IN IOWA MOLD MATTER; DRAFT COMPLAINT IN NOVA MATTER	
07/13/2009	210	.40	.40	140.00	56.00	DRAFT ORDER APPROVING SETTLEMENT. EMAIL ORDERS TO JUDGE FOR SIGNATURE.	
07/14/2009	023	.80	.80	355.00	284.00	REVIEW PROPOSED STIPULATION FOR EXTENSION ON DEADLINES; REVIEW AND REVISE NOVA PREFERENCE COMPLAINT.	
07/14/2009	045	.30	.30	195.00	58.50	CONFERENCE WITH J. CHRISTIANS REGARDING IOWA MOLD SCHEDULING ORDER AND NOVA COMPLAINT; E-MAIL TO IOWA MOLD COUNSEL REGARDING STIPULATION TO AMEND SCHEDULING ORDER; ATTENTION TO FILING OF NOVA COMPLAINT	
07/14/2009	046	.60	.60	130.00	78.00	ARRANGE FOR FILING OF NOVA TOOL & MOLD ADVERSARY COMPLAINT; CONFIRM ADDRESS OF DEFENDANT; DRAFT SERVICE LETTERS FOR SAME	
07/15/2009	023	.60	.60	355.00	213.00	REVIEW INCOMING CORRESPONDENCE FROM OPPOSING COUNSEL AND ATTENTION TO FINAL SETTLEMENT PAYMENT IN PDS SUIT; REVIEW CORRESPONDENCE REGARDING DEFAULT IN RESPONSES TO DISCOVERY BY DEFENDANT MSI.	
07/15/2009	045	.30	.30	195.00	58.50	E-MAILS REGARDING STIPULATION TO AMEND IOWA MOLD SCHEDULING ORDER; E-MAIL TO MSI COUNSEL REGARDING OVERDUE DISCOVERY RESPONSES	
07/16/2009	045	.30	.30	195.00	58.50	ATTENTION TO FILING OF STIPULATION TO AMEND IOWA MOLD SCHEDULING ORDER; ATTENTION TO SERVICE OF NOVA COMPLAINT	
07/17/2009	023	.70	.70	355.00	248.50	DRAFT, SERVE AND FILE DISMISSAL OF PDS ADVERSARY AND PROPOSED ORDER.	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 13

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
07/20/2009	023	.70	.70	355.00	248.50	REVIEW COURT ORDER REGARDING PDS ADVERSARY DISMISSAL; REVIEW INCOMING CORRESPONDENCE AND MONITOR PARTIAL SETTLEMENT BY TRANSFEREE PRECISION FASTENERS; REVIEW COURT ORDER APPROVING STIPULATION IN IOWA MOLD SUIT.	
07/22/2009	023	.20	.20	355.00	71.00	REVIEW COURT ORDER FOR DEADLINES IN IOWA MOLD ADVERSARY.	
07/22/2009	045	.20	.20	195.00	39.00	TELEPHONE CONFERENCE WITH CHAMBERS REGARDING FILING OF NOVA COMPLAINT; INTERNAL E-MAILS REGARDING SAME	
07/23/2009	023	.30	.30	355.00	106.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY DICASTRI REGARDING NEGOTIATIONS ON TOOLING TECH PREFERENCE.	
07/27/2009	045	.10	.10	195.00	19.50	E-MAILS WITH R. MARTIN REGARDING DISCOVERY IN IOWA MOLD MATTER	
08/03/2009	023	.40	.40	355.00	142.00	STRATEGY CONFERENCE WITH ATTORNEY CANDEE REGARDING DISCOVERY AND MOTIONS IN IOWA MOLD AND MSI ADVERSARIES.	
08/03/2009	045	.60	.60	195.00	117.00	CONFERENCE WITH J. CHRISTIANS REGARDING IOWA MOLD AND MSI ADVERSARY PROCEEDINGS; REVIEW IOWA MOLD'S DISCOVERY RESPONSES	
08/05/2009	023	.40	.40	355.00	142.00	CONFERENCES WITH ATTORNEY CANDEE AND REVIEW AND COMMENTS ON PROPOSED OFFER REGARDING IOWA MOLD ADVERSARY.	
08/05/2009	045	2.10	2.10	195.00	409.50	CONFERENCE WITH J. CHRISTIANS REGARDING IOWA MOLD; REVIEW IOWA MOLD'S DISCOVERY RESPONSES AND DOCUMENTS; ANALYZE DEFENSES; DRAFT SETTLEMENT COMMUNICATION	
08/06/2009	023	1.60	1.60	355.00	568.00	DRAFT COMPLAINT V. PREFERENCE TRANSFEREE TOOLING TECHNOLOGIES; SEARCH SECRETARY OF STATE RECORDS RE CORPORATE ID AND AGENT FOR SERVICE; ATTENTION TO FILING AND SERVICE INSTRUCTIONS.	
08/06/2009	045	1.40	1.40	195.00	273.00	E-MAILS WITH IOWA MOLD COUNSEL REGARDING SETTLEMENT; TELEPHONE CONFERENCE WITH IOWA MOLD COUNSEL; ADDITIONAL ANALYSIS OF IOWA MOLD DEFENSES; E-MAIL TO J. CHRISTIANS REGARDING SETTLEMENT STATUS; TELEPHONE CONFERENCE WITH NOVA COUNSEL; E-MAIL TO J. CHRISTIANS REGARDING SAME	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 14

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
08/07/2009	023	.70	.70	355.00	248.50	REVIEW DEFENDANT NOVA REQUEST FOR EXTENSION; SETTLEMENT STRATEGY CONFERENCE AND ANALYSIS OF ORDINARY COURSE DEFENSE ON IOWA MOLD SUIT.	
08/07/2009	045	.40	.40	195.00	78.00	CONFERENCE WITH J. CHRISTIANS REGARDING IOWA MOLD; E-MAILS REGARDING NOVA; REVIEW IOWA MOLD SETTLEMENT COUNTER OFFER AND E-MAIL TO J. CHRISTIANS REGARDING SAME; E-MAILS REGARDING INDUSTRIAL FINISHING	
08/10/2009	023	.90	.90	355.00	319.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY DICASTRI ON TOOLING TECH ADVERSARY; MEMO TO ATTORNEY CANDEE; STRATEGY CONFERENCE WITH CANDEE REGARDING DISCOVERY IN IOWA MOLD.	
08/10/2009	045	5.60	5.60	195.00	1,092.00	RESEARCH LAW REGARDING NEW VALUE AND ORDINARY COURSE; CONFERENCES WITH J. CHRISTIANS REGARDING IOWA MOLD MATTER; DRAFT RESPONSES TO IOWA MOLD DISCOVERY; DRAFT SETTLEMENT COMMUNICATION TO IOWA MOLD; CONFERENCE WITH J. CHRISTIANS REGARDING TOOLING TECHNOLOGIES, INC.	
08/11/2009	023	.50	.50	355.00	177.50	REVIEW AND REVISE PLAINTIFF'S RESPONSES TO DISCOVERY AND SETTLEMENT COUNTER-OFFER IN IOWA MOLD.	
08/11/2009	045	1.10	1.10	195.00	214.50	CONFERENCE WITH J. CHRISTIANS REGARDING IOWA MOLD MATTER; FINALIZE RESPONSES TO IOWA MOLD DISCOVERY; DRAFT SECOND INTERROGATORIES AND DOCUMENT REQUESTS TO IOWA MOLD; REVISE AND FINALIZE SETTLEMENT COMMUNICATION; ATTENTION TO SERVICE OF DISCOVERY AND DISCOVERY RESPONSES	
08/12/2009	023	.20	.20	355.00	71.00	REVIEW STIPULATION FOR EXTENSION IN NOVA ADVERSARY.	
08/12/2009	045	1.60	1.60	195.00	312.00	REVIEW TOOLING TECHNOLOGIES COMPLAINT AND FILE DOCUMENTS; DRAFT INTERROGATORIES AND DOCUMENT REQUESTS TO TOOLING TECHNOLOGIES; ATTENTION TO SERVICE OF SAME; TELEPHONE CONFERENCES WITH COUNSEL FOR NOVA; DRAFT STIPULATION TO EXTEND TIME TO ANSWER; E-MAIL TO COUNSEL REGARDING SAME	
08/13/2009	045	.30	.30	195.00	58.50	TELEPHONE CONFERENCE WITH NOVA COUNSEL REGARDING EXTENSION; ATTENTION TO FILING OF STIPULATION REGARDING SAME	

LAPP LIBRA THOMSON STOEbNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 15

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
08/14/2009	023	.40	.40	355.00	142.00	REVIEW COURT ORDER ON NOVA ADVERSARY; REVIEW CORRESPONDENCE REGARDING IOWA MOLD NEGOTIATIONS.	
08/14/2009	045	.10	.10	195.00	19.50	E-MAILS WITH IOWA MOLD COUNSEL REGARDING SETTLEMENT	
08/16/2009	045	1.10	1.10	195.00	214.50	RESEARCH LAW REGARDING DISCOVERY SANCTIONS; BEGIN DRAFTING MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT	
08/17/2009	045	2.10	2.10	195.00	409.50	CONTINUE DRAFTING MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT AND DISCOVERY SANCTIONS; RESEARCH LAW REGARDING SAME	
08/18/2009	045	2.90	2.90	195.00	565.50	COMPLETE FIRST DRAFT OF BRIEF IN SUPPORT OF SUMMARY JUDGMENT AGAINST MSI; E-MAIL TO J. CHRISTIANS REGARDING SAME; TELEPHONE CONFERENCE WITH IOWA MOLD COUNSEL REGARDING SETTLEMENT; E-MAIL TO J. CHRISTIANS REGARDING SAME	
08/19/2009	023	1.40	1.40	355.00	497.00	REVIEW AND REVISE MOTION FOR DISCOVERY SANCTIONS AND SUMMARY JUDGMENT IN MSI ADVERSARY; SETTLEMENT NEGOTIATIONS IN IOWA MOLD ADVERSARY.	
08/19/2009	045	1.50	1.50	195.00	292.50	E-MAILS WITH IOWA MOLD COUNSEL REGARDING SETTLEMENT; CONFERENCE WITH J. CHRISTIANS REGARDING SAME; CONFERENCE WITH J. CHRISTIANS REGARDING MSI MOTION FOR SUMMARY JUDGMENT; DRAFT IOWA MOLD SETTLEMENT AGREEMENT; E-MAIL TO IOWA MOLD COUNSEL REGARDING SAME; REVISE MSI SUMMARY JUDGMENT BRIEF; BEGIN DRAFTING AFFIDAVIT IN SUPPORT OF SAME	
08/20/2009	045	2.60	2.60	195.00	507.00	COMPLETE FIRST DRAFT OF DECLARATION OF TDC IN SUPPORT OF SUMMARY JUDGMENT IN MSI MATTER; DRAFT DECLARATION OF JAC IN SUPPORT OF SUMMARY JUDGMENT IN MSI MATTER; DRAFT CERTIFICATION OF MEET AND CONFER REGARDING SAME; REVISE MEMORANDUM OF LAW REGARDING SAME; TELEPHONE CONFERENCE WITH COURT CLERK REGARDING IOWA MOLD SETTLEMENT; E-MAIL TO IOWA MOLD COUNSEL REGARDING SAME	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 16

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
08/21/2009	023	1.30	1.30	355.00	461.50	REVIEW AND REVISE PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER FOR JUDGMENT AND AFFIDAVIT ON SUMMARY JUDGMENT AND SANCTIONS MOTION AGAINST DEFENDANT MSI MOLD; REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY ON TOOLING TECH ADVERSARY REGARDING DISPUTE OVER RESPONSE TIME ON INTERROGATORIES.	
08/21/2009	045	3.10	3.10	195.00	604.50	E-MAILS TO TTI COUNSEL REGARDING DISCOVERY; REVISE AND FINALIZE MOTION PAPERS FOR MSI SUMMARY JUDGMENT; OBTAIN HEARING DATE FOR SAME; ATTENTION TO FILING AND SERVICE OF SAME;	
08/24/2009	045	.10	.10	195.00	19.50	E-MAILS WITH TTI COUNSEL REGARDING DISCOVERY RESPONSES	
08/25/2009	045	.90	.90	195.00	175.50	E-MAILS WITH IOWA MOLD COUNSEL REGARDING SETTLEMENT AGREEMENT; INTERNAL E-MAILS REGARDING SAME; CONFERENCE WITH J. CHRISTIANS REGARDING TTI MATTER; TELEPHONE CONFERENCE WITH TTI COUNSEL REGARDING SETTLEMENT	
08/26/2009	023	.40	.40	355.00	142.00	STRATEGY CONFERENCE REGARDING SUBSEQUENT NEW VALUE DEFENSE OF DEFENDANT TOOLING TECH AND SETTLEMENT NEGOTIATIONS.	
08/26/2009	045	3.90	3.90	195.00	760.50	RESEARCH LAW REGARDING ORDINARY COURSE AND TIMING OF NEW VALUE; ANALYZE PREFERENCE CLAIM AGAINST TTI; DRAFT ANALYSIS FOR J. CHRISTIANS; ATTENTION TO EXECUTION OF IOWA MOLD SETTLEMENT AGREEMENT	
08/27/2009	023	.70	.70	355.00	248.50	REVIEW COMPETING ORDINARY COURSE ANALYSES ON TOOLING TECH ADVERSARY; LITIGATION STRATEGY CONFERENCE.	
08/27/2009	045	.40	.40	195.00	78.00	CONFERENCE WITH J. CHRISTIANS REGARDING TTI MATTER; E-MAIL TO TTI COUNSEL REGARDING SAME	
08/31/2009	045	.50	.50	195.00	97.50	E-MAILS WITH J. CHRISTIANS REGARDING TTI SETTLEMENT; DRAFT SETTLEMENT AGREEMENT FOR TTI ADVERSARY; DRAFT CORRESPONDENCE TO TTI COUNSEL REGARDING SAME; E-MAILS WITH IOWA MOLD COUNSEL	
09/01/2009	023	.40	.40	355.00	142.00	SETTLEMENT NEGOTIATIONS ON TOOLING TECH ADVERSARY.	
09/02/2009	023	.30	.30	355.00	106.50	TELEPHONE CONFERENCE WITH OPPOSING COUNSEL ON PENDING MOTION IN MSI ADVERSARY.	

LAPP LIBRA THOMSON STOEbNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 17

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
09/02/2009	045	.20	.20	195.00	39.00	CONFERENCE WITH J. CHRISTIANS REGARDING MSI STATUS; REVIEW FILE REGARDING SAME	
09/03/2009	023	.30	.30	355.00	106.50	REVIEW INCOMING CORRESPONDENCE FROM ATTORNEY MARTIN WITH SETTLEMENT CHECK ON IOWA MOLD ADVERSARY.	
09/03/2009	045	1.00	1.00	195.00	195.00	E-MAILS WITH TTI COUNSEL REGARDING SETTLEMENT AGREEMENT; DRAFT SUMMARY OF IOWA MOLD SETTLEMENT; CONFERENCE WITH J. CHRISTIANS REGARDING MSI MATTER; TELEPHONE CONFERENCE WITH MSI COUNSEL	
09/04/2009	045	.40	.40	195.00	78.00	CONFERENCE WITH J. CHRISTIANS REGARDING MSI MATTER; REVIEW DISCOVERY RESPONSES AND RESPONSE TO SUMMARY JUDGMENT MOTION; OBTAIN EXECUTION OF TTI AGREEMENT; REVIEW TTI NOTICE OF SETTLEMENT; E-MAILS WITH TTI COUNSEL	
09/08/2009	045	.10	.10	195.00	19.50	CONFERENCE WITH J. CHRISTIANS REGARDING MSI MOTION	
09/10/2009	023	.30	.30	355.00	106.50	TELEPHONE CONFERENCE WITH ATTORNEY IANNAcone REGARDING SETTLEMENT NEGOTIATIONS AND MOTION ISSUES ON MSI PREFERENCE SUIT.	
09/10/2009	045	4.40	4.40	195.00	858.00	PREPARE FOR HEARING ON MSI MOTION; CONFERENCES WITH J. CHRISTIANS REGARDING SAME; TELEPHONE CONFERENCE WITH M. IANNAcone REGARDING SAME; TRAVEL TO AND FROM ST. PAUL FOR HEARING ON SAME; ARGUE HEARING; REVISE PROPOSED ORDER; E-MAILS WITH CLERK REGARDING SAME; EXCHANGE VOICE MESSAGES WITH NOVA COUNSEL	
09/11/2009	023	.40	.40	355.00	142.00	SETTLEMENT NEGOTIATIONS ON MSI PREFERENCE SUIT.	
09/11/2009	045	.60	.60	195.00	117.00	TELEPHONE CONFERENCES WITH MSI COUNSEL REGARDING SETTLEMENT; CONFERENCE WITH J. CHRISTIANS REGARDING SAME; DRAFT SETTLEMENT AGREEMENT;	
09/14/2009	023	.40	.40	355.00	142.00	REVIEW ANSWER AND DEMAND FOR JURY TRIAL FILED BY DEFENDANT NOVA.	
09/14/2009	210	.20	.20	140.00	28.00	EMAIL PROPOSED ORDER TO JUDGE FOR SIGNATURE.	
09/16/2009	045	.50	.50	195.00	97.50	REVIEW NOVA ANSWER; TELEPHONE CONFERENCE WITH NOVA COUNSEL; CONFERENCE WITH J. CHRISTIANS REGARDING MSI SETTLEMENT; NOTIFY COURT OF SAME; E-MAILS REGARDING NOTICE OF SETTLEMENT	
09/18/2009	023	.30	.30	355.00	106.50	ATTENTION TO SETTLEMENT DOCUMENTS IN MSI ADVERSARY.	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 18

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
09/18/2009	045	.20	.20	195.00	39.00	REVIEW AND FORWARD MSI NOTICE OF SETTLEMENT; REVIEW ORDER FOR SCHEDULING CONFERENCE IN NOVA	
09/21/2009	023	.70	.70	355.00	248.50	REVIEW SCHEDULING ORDER IN NOVA ADVERSARY; ATTENTION TO FILING ON MSI ADVERSARY SETTLEMENT; RECOVER PARTIAL SETTLEMENT ON PRECISION FASTENERS.	
09/29/2009	023	.30	.30	355.00	106.50	STRATEGY CONFERENCE RE ISSUES OF TRANSFER AND JURY TRIAL REQUEST IN NOVA ADVERSARY.	
09/29/2009	210	.20	.20	140.00	28.00	EMAIL ORDER TO JUDGE FOR SIGNATURE.	
10/01/2009	023	.10	.10	355.00	35.50	REVIEW COURT ORDER RE IOWA MOLD ADVERSARY SETTLEMENT.	
10/05/2009	045	.40	.40	195.00	78.00	E-MAILS WITH IOWA MOLD COUNSEL; DRAFT STIPULATION FOR DISMISSAL; ATTENTION TO FILING OF SAME	
10/08/2009	023	.10	.10	355.00	35.50	REVIEW COURT ORDER DISMISSING IOWA MOLD ADVERSARY.	
10/09/2009	023	.90	.90	356.00	177.50	E-MAIL CORRESPONDENCE FROM AND TO JUDGE'S CLERK REGARDING SETTLEMENT ISSUES IN ADVERSARIES; REVIEW AND REVISE PROPOSED ORDERS.	
10/09/2009	045	.10	.10	195.00	19.50	REVIEW COURT APPROVAL OF TTI SETTLEMENT; E-MAIL TO TTI COUNSEL REGARDING SAME	
10/19/2009	045	.30	.30	195.00	58.50	BEGIN DRAFTING DISCOVERY IN NOVA MATTER;	
10/20/2009	023	.40	.40	355.00	142.00	REVIEW AND REVISE PROPOSED ORDER ON MSI SETTLEMENT; STRATEGY CONFERENCE WITH ATTORNEY CANDEE ON NOVA PRETRIAL SCHEDULING.	
10/20/2009	045	1.70	1.70	195.00	331.50	FINALIZE DISCOVERY TO NOVA; ATTENTION TO SERVICE OF SAME; E-MAIL TO NOVA COUNSEL REGARDING SETTLEMENT; REVIEW CHAPTER 11 FILES AND PREPARE FOR SCHEDULING CONFERENCE IN NOVA MATTER	
10/21/2009	045	.30	.30	195.00	58.50	REVIEW COURT ORDER APPROVING MSI SETTLEMENT; INTERNAL E-MAILS REGARDING STATUS OF PAYMENT OF SAME; DRAFT STIPULATION FOR DISMISSAL AND SEND TO MSI COUNSEL	
10/22/2009	045	.30	.30	195.00	58.50	TELEPHONE CONFERENCES AND E-MAILS REGARDING RESCHEDULING OF SCHEDULING CONFERENCE IN NOVA MATTER; ATTENTION TO FILING OF STIPULATION OF DISMISSAL IN MSI;	
10/23/2009	023	.40	.40	355.00	142.00	REVIEW INCOMING CORRESPONDENCE FROM JUDGE'S CLERK ON TOOLING ADVERSARY; MEMO TO PARALEGAL.	

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 19

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
10/26/2009	023	.30	.30	355.00	106.50	E-MAIL CORRESPONDENCE FROM AND TO JUDGE'S CLERK IN TOOLING TECH ADVERSARY.	
10/26/2009	045	.60	.60	195.00	117.00	CONFERENCE WITH J. CHRISTIANS REGARDING STATUS OF TTI MATTER; TELEPHONE CONFERENCE WITH COURT REGARDING SAME; LEAVE VOICE MESSAGE FOR TTI COUNSEL REGARDING SAME; DRAFT NOTICE OF DISMISSAL; ATTENTION TO FILING AND SERVICE OF SAME	
11/05/2009	045	.50	.50	195.00	97.50	E-MAILS WITH COURT REGARDING SCHEDULING CONFERENCE AND JURY TRIAL ISSUE IN NOVA ADVERSARY; CONFERENCE WITH J. CHRISTIANS REGARDING SAME	
<u>Timekeepers</u>		<u>Hours Worked</u>	<u>Hours To Bill</u>		<u>Rate</u>	<u>Amount</u>	
023		24.90	24.90		345.00	8,590.50	
023		61.60	61.60		355.00	21,868.00	
023		.90	.90		356.00	177.50	
045		51.10	51.10		195.00	9,964.50	
046		8.10	8.10		130.00	1,053.00	
210		.90	.90		135.00	121.50	
210		1.70	1.70		140.00	238.00	
Timekeeper Totals		149.20	149.20			\$42,013.00	
				Bill Total	\$42,013.00		
				Last Active	1/1/1900		
					Last Payment		

EXHIBIT D

LAPP LIBRA THOMSON STOEBCNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 20

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper					
0004888-08204C		DOE ESTATE, JANE			VICTOR PLASTICS, INC.		023	CHRISTIANS, JULIA A.				
<u>Originating Timekeeper</u>												
023	CHRISTIANS, JULIA A.											
<u>Date</u>	<u>Timekeeper</u>	<u>Hours Worked</u>	<u>Hours To Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Narrative</u>	<u>Task Code</u>	<u>Activity Code</u>	<u>Budget Phase</u>	<u>Code 1</u>	<u>Code 2</u>	<u>Code 3</u>
10/08/2008	023	.50	.50	345.00	172.50	ATTENTION TO ISSUE OF OFFSET CLAIM BY TRUE NORTH ON INSURANCE AUDIT.						
01/05/2009	023	2.00	2.00	355.00	710.00	REVIEW INCOMING CORRESPONDENCE AND DOCUMENTATION REGARDING DISPUTE OVER ESCROW WITHHELD ON EMC ACCOUNT; DRAFT REPLY.						
01/06/2009	023	.30	.30	355.00	106.50	DRAFT CORRESPONDENCE TO EMC RE ISSUE OF TURNOVER OF FUNDS.						
01/13/2009	023	.40	.40	355.00	142.00	CORRESPONDENCE FROM AND TO B. ARNOLD RE EMC DOCUMENTS.						
01/14/2009	023	2.30	2.30	355.00	816.50	TELEPHONE CONFERENCE WITH ATTORNEY FOR EMC REGARDING ISSUES OF WORKERS COMP LETTER OF CREDIT FUNDS; LEGAL RESEARCH; NOTES TO FILE.						
01/22/2009	023	1.90	1.90	355.00	674.50	REVIEW INCOMING CORRESPONDENCE AND SUPPORTING DOCUMENTATION FROM COUNSEL FOR EMC RISK SERVICES LLC REGARDING DISPUTED WORKERS COMP LETTER OF CREDIT HOLDBACK ISSUES.						
03/13/2009	023	1.00	1.00	355.00	355.00	NUMEROUS E-MAIL LETTERS FROM AND TO INSURER REGARDING AUDIT AND RETURN PREMIUM CLAIMS AND HOLDBACK ISSUES.						
04/08/2009	023	1.10	1.10	355.00	390.50	REVIEW INFORMATION RECEIVED FROM ATTORNEY MEYER REGARDING HEALTH FUND CREDIT; TELEPHONE CONFERENCE WITH ATTORNEY QUARTER FOR WELLMARK REGARDING CLAIM FOR FUNDS; REVIEW INCOMING CORRESPONDENCE FROM W. ARNOLD AND ACCOUNTING FROM EMC REGARDING ESCROWED FUNDS.						
04/27/2009	023	.70	.70	355.00	248.50	REVIEW INCOMING CORRESPONDENCE AND AUDIT DOCUMENTS FROM TRUE NORTH RE EMC INSURANCE ACCOUNTS.						
05/28/2009	023	.40	.40	355.00	142.00	TELEPHONE CONFERENCE WITH INSURER REGARDING WELLMARK'S PARTIAL AGREEMENT TO TURNOVER OF HELDBACK FUNDS.						
05/29/2009	023	.30	.30	355.00	106.50	ATTENTION TO WELLMART TURNOVER DEMAND RESPONSE; REVIEW FOR EXTENT OF COMPLIANCE.						
06/08/2009	023	.50	.50	355.00	177.50	MEMOS TO AND FROM PARALEGAL REGARDING STATUS OF WELLMARK CLAIM RECOVERY.						

LAPP LIBRA THOMSON STOEbNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 21

Client-Matter		Client Reporting Name			Matter Reporting Name		Billing Timekeeper
06/15/2009	023	.40	.40	355.00	142.00	REVIEW ACCOUNTING AND ATTENTION TO FURTHER TURNOVER ON WELLMARK OVERPAYMENT CLAIM.	
<u>Timekeepers</u>		<u>Hours Worked</u>		<u>Hours To Bill</u>	<u>Rate</u>	<u>Amount</u>	
023		.50		.50	345.00	172.50	
023		11.30		11.30	355.00	4,011.50	
Timekeeper Totals		11.80		11.80		\$4,184.00	
Bill Total					\$4,184.00		
Last Active					1/1/1900		Last Payment

EXHIBIT E

LAPP LIBRA THOMSON STOEbNER & PUSCH CHARTERED

Work In Process

Report ID: AC1050 - 26049
 Wednesday, November 11, 2009

Beginning To End

Printed By 210
 Page 22

Client-Matter	Client Reporting Name	Matter Reporting Name	Billing Timekeeper	
---------------	-----------------------	-----------------------	--------------------	--

0004888-08204D	DOE ESTATE, JANE	VICTOR PLASTICS, INC.	023	CHRISTIANS, JULIA A.
----------------	------------------	-----------------------	-----	----------------------

Originating Timekeeper

023 CHRISTIANS, JULIA A.

<u>Date</u>	<u>Timekeeper</u>	<u>Hours Worked</u>	<u>Hours To Bill</u>	<u>Rate</u>	<u>Amount</u>	<u>Narrative</u>	<u>Task Code</u>	<u>Activity Code</u>	<u>Budget Phase</u>	<u>Code 1</u>	<u>Code 2</u>	<u>Code 3</u>
11/09/2009	023	3.20	3.20	355.00	1,136.00	BEGIN DRAFTING NOTICE OF HEARING AND MOTION FOR APPROVAL OF INTERIM COMPENSATION AND PREPARATION OF SUPPORTING EXHIBITS.						
11/10/2009	023	3.40	3.40	355.00	1,207.00	CONTINUE WORK ON INTERIM FEE MOTION AND SUPPORTING EXHIBITS; ATTENTION TO HEARING SCHEDULING AND SERVICE INSTRUCTIONS.						

<u>Timekeepers</u>	<u>Hours Worked</u>	<u>Hours To Bill</u>	<u>Rate</u>	<u>Amount</u>
023	6.60	6.60	355.00	2,343.00
Timekeeper Totals	6.60	6.60		\$2,343.00

<u>Disbursements</u>	<u>Expense Code</u>	<u>Amount</u>	<u>Narrative</u>	<u>Task Code</u>	<u>Budget Phase</u>	<u>Code 1</u>	<u>Code 2</u>	<u>Code 3</u>
09/30/2008	801	.55	LONG DISTANCE TELEPHONE					
10/22/2008	816	23.77	FEDERAL EXPRESS					
04/10/2009	812	5.49	POSTAGE					
04/14/2009	812	6.41	POSTAGE					
04/24/2009	812	5.49	POSTAGE					
06/30/2009	828	11.01	WESTLAW					
07/14/2009	803	250.00	FILING FEE FOR ADVERSARY MATTER					
07/16/2009	800	6.00	DOCUMENT COPYING					
08/31/2009	828	155.43	WESTLAW					
09/10/2009	806	13.42	MILEAGE: 24.4 MILES @ \$0.55/MILE					
09/10/2009	807	24.50	PARKING					
09/30/2009	828	3.85	WESTLAW					
10/31/2009	828	6.58	WESTLAW					

<u>Exp Code</u>	<u>Amount</u>
800	6.00
801	.55
803	250.00
806	13.42
807	24.50
812	17.39
816	23.77

LAPP LIBRA THOMSON STOEBNER & PUSCH CHARTERED
Work In Process

Report ID: AC1050 - 26049
Wednesday, November 11, 2009

Beginning To End

Printed By 210
Page 23

Client-Matter	Client Reporting Name	Matter Reporting Name	Billing Timekeeper
828	176.87		
Disbursement Totals	\$512.50		
	Bill Total	\$2,855.50	
	Last Active	11/10/2009	Last Payment

LAPP LIBRA THOMSON STOEBNER & PUSCH CHARTERED
Work In Process

Report ID: AC1050 - 26049
Wednesday, November 11, 2009

Beginning To End

Printed By 210
Page 24

Client-Matter	Client Reporting Name		Matter Reporting Name	Billing Timekeeper	
	<u>Hours Worked</u>	<u>Hours To Bill</u>	<u>Amount</u>	<u>Expenses</u>	<u>Bill Total</u>
Grand Total	173.90	173.90	\$50,713.50	\$512.50	\$51,226.00

*** End Of Report ***

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

CHAPTER 7

BKY CASE NO. 09-40171-DDO

Victor Plastics Inc.,

Debtor.

UNSWORN CERTIFICATE OF SERVICE

I, Rebecca L. Tri, declare under penalty of perjury that on November 13, 2009, I mailed copies of the attached **Notice of Hearing and Application for Interim Compensation by Attorneys for the Trustee; and Proposed Order** by first class mail postage prepaid to each entity named below at the address stated below for each entity:

VICTOR PLASTICS INC
1125 240TH STREET NE
NORTH LIBERTY, IA 52317

Creditor Committee Chair
Packaging Distribution Service
2308 Sunset Road
Des Moines, IA 50321

Creditor Committee
PolySource LLC.
1965 Southbrook Drive
Ely, IA 52227

Creditor Committee
Mega Mold International Inc.
8025 Anchor Drive
Windsor, OT N8N 5B7
Canada

Creditor Committee
Tooling Technologies Inc
C/O Joseph Kraft
10179 S 56th Street
Franklin, WI 53132

Creditor Committee
PolySource LLC
1003 Industrial Drive
Pleasant Hill, MO 64080

IKON FINANCIAL SERVICES
BKY ADMINISTRATION
1738 BASS RD
PO BOX 13708
MACON, GA 31208-3708

IKON OFFICE SOLUTIONS
RECOVERY & BKY GROUP
3920 ARKWRIGHT RD STE 400
MACON, GA 31210

PolySource LLC
c/o Joel Pelofsky
Spencer Fane Britt & Browne LLP
1000 Walnut, Suite 1400
Kansas City, MO 64106-2140

JEFFREY W COURTER
NYMASTER GOOD WEST HANSELL & O'BRIEN PC
700 WALNUT ST, STE 1600
DES MOINES, IA 50309-3899

Jeff D. Rawlings
P O Box 1789
Madison, MS 39130

Leonard Street and Deinard PA
Robert T. Kugler and Sarah E. Doerr
150 South Fifth Street, Suite 2300
Minneapolis, MN 55402

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive e-mail notice/service for this case.

- SHARON M BEAUSOLEIL-MAYER sbeausoleil-mayer@fulbright.com
- *Phillip Bohl phillip.bohl@gpmlaw.com
- Jon R. Brakke jbrakke@vogellaw.com, skroeplin@vogellaw.com;jnona@vogellaw.com
- *Matthew R. Burton mburton@losgs.com
- *Tyler D. Candee tcandee@lapplibra.com, dwegler@lapplibra.com
- *Julia A. Christians jchristians@lapplibra.com,
lfrey@lapplibra.com;rtri@lapplibra.com;MN0A@ecfcbis.com
- *Julia A. Christians jchristians@lapplibra.com, rtri@lapplibra.com;lfrey@lapplibra.com
- *Monica L. Clark clark.monica@dorseylaw.com

- *Gordon B. Conn conn@kwgc-law.com
- Kenneth Corey-Edstrom kcoreyedstrom@larkinhoffman.com,
bhogan@larkinhoffman.com;bpeppersack@larkinhoffman.com;klatham@larkinhoffman.com
- *Michael Fadlovich michael.fadlovich@usdoj.gov
- William Fisher william.fisher@gpmlaw.com
- *Barton C. Gernander bgernander@hjlawfirm.com
- Jeffrey D. Goetz goetz.jeffrey@bradshawlaw.com,
bankruptcyfile@bradshawlaw.com;neiman.donald@bradshawlaw.com
- *Stephen B. Grow sgrow@wnj.com, kfrantz@wnj.com
- *WESLEY B HUISINGA wbh@shuttleworthlaw.com
- J. D. Haas jdhaas@jdhaas.com
- Michael J Iannacone mji@iannacone.com, knt@iannacone.com
- Carole Clark Isakson isakson@kwgc-law.com
- Douglas W. Kassebaum dkassebaum@fredlaw.com,
scharter@fredlaw.com;bankruptcy@fredlaw.com
- Chad A Kelsch ckelsch@hjlawfirm.com, tloyd@hjlawfirm.com
- *Faye Knowles fknowles@fredlaw.com, tstpierre@fredlaw.com
- *Thomas Lallier tlallier@foleymansfield.com
- *Joseph W. Lawver jlawver@messerlikramer.com, mnygaard@messerlikramer.com
- Douglas J. Lipke dlipke@vedderprice.com, nfrankel@vedderprice.com
- *James A. Lodoen jlodoen@lindquist.com, gluessenheide@lindquist.com
- Nauni J Manty ecf@mantylaw.com
- Ronald C Martin ronm@drpjlaw.com, laurie@drpjlaw.com
- *G. Christopher Meyer cmeyer@ssd.com
- *Michael L Meyer mlmeyer@ravichmeyer.com
- *Kathleen M. Miller kmiller@skfdelaware.com
- Joseph A Peiffer joep@drpjlaw.com, laurie@drpjlaw.com
- Michael G Phillips phillipslaw@comcast.net, starr4law@yahoo.com
- Tracey L. Porter tracey@schaferandweiner.com, tporter814@gmail.com
- John D. Schrager jschrager@wfjltd.com, akrueger@wfjltd.com

- Donald A. Snide dasnide@varnumlaw.com
- Olufemi O Solade osolade@fulbright.com, sbechtel@fulbright.com
- *Michael R. Stewart mstewart@faegre.com
- *Will R. Tansey wrtansey@ravichmeyer.com
- John C. Thomas jct@weberthomaslaw.com
- *US Trustee ustpreion12.mn.ecf@usdoj.gov

Executed on: November 13, 2009

/e/ Rebecca L. Tri
Rebecca L. Tri, Legal Assistant
Lapp, Libra, Thomson, Stoeber &
Pusch, Chartered
120 South Sixth Street, Suite 2500
Minneapolis, MN 55402
612/338-5815

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re:

BKY No. 08-40171-DDO
Chapter 7 Case

Victor Plastics Inc.,

**ORDER ALLOWING INTERIM
COMPENSATION TO ATTORNEYS
FOR THE TRUSTEE**

Debtor.

This case is before the court on the motion of Lapp, Libra, Thomson, Stoebner & Pusch, Chartered, for interim compensation as attorneys for the trustee.

Based on the motion and the files,

IT IS ORDERED:

Lapp, Libra, Thomson, Stoebner & Pusch, Chartered is awarded the sum of \$50,713.50 as interim compensation as attorneys for the trustee and is awarded the sum of \$512.50 as reimbursement of expenses incurred and advanced, for a total of \$51,226.00. Said amount is to be paid by the trustee from the funds on hand.

Dated:

Dennis D. O'Brien
United States Bankruptcy Judge